

City of St. Louis HOME-ARP Allocation Plan

The American Rescue Plan (ARP) appropriated \$5 billion nationwide to provide housing, services, and shelter to individuals experiencing homelessness and other vulnerable populations. In September 2021, the U.S. Department of Housing and Urban Development awarded the City of St. Louis of \$10,635,523 in HOME-American Rescue Plan Act of 2021 ("HOME-ARP") funding from the U.S. Department of Housing and Urban Development (HUD) made available through the HOME Investment Partnerships Act (42 U.S.C. 12701 et seq.) and Section 3205 of the American Rescue Plan ("ARP") (Pub. L. No. 117-2). HOME-ARP fund is to be used to help communities create affordable housing and services for people experiencing or at risk of experiencing homelessness.

In order to utilize funding, the City of St. Louis must develop and submit to HUD for approval a HOME-ARP Allocation Plan which describes the intended use of funds and identify any preferences for eligible activities. The development of the Plan is based on the requirements of Community Planning and Development (CPD) Notice 21-10. It involves stakeholder consultation and community engagement.

Eligible activities that may be funded with HOME-ARP include:

- Development and support of affordable housing;
- Tenant-based rental assistance (TBRA);
- Provision of supportive services (such as housing counseling, homelessness prevention, child care, job training, legal services, case management, moving costs, rental applications, and rent assistance); and
- Acquisition and development of non-congregate shelter units

The following is the HOME-ARP Allocation Plan for the City of St. Louis.

Consultation

In developing its HOME ARP allocation plan, The City of St. Louis began discussions regarding HOME ARP funding in the latter part of 2021 and centered around the need for more permanent housing for the homeless population in the City of St. Louis. It has been evident through annual point in time census counts and housing inventory counts conducted in St. Louis for some time now, that more permanent housing is needed to truly address the needs of the homeless population and for those at risk of homelessness.

The initial meetings from September – November were primarily between the Community Development Administration and the Department of Human Services (DHS). The Mayor's office began joining these conversations as well and it was determined after initial meetings that mid 2022 would be out target for completion of our plan to HUD. After internal meetings and discussions amongst City departments as well as strategizing on how to effectively utilize the one-time HOME ARP allocation, efforts were made to consult with others entities, as required by HUD, that address the needs of qualifying populations.

In late May 2022, the City of St. Louis provided a survey to both the St. Louis Public Housing Authority as well as the St. Louis Continuum of Care and were completed in early June 2022. Surveys were specific to

each entity and stated that the City of St Louis is seeking feedback as it relates to the usage of HOME ARP funding. The St. Louis Continuum of Care provided a generous amount of feedback via survey. Following the survey, were meetings with stakeholders in the City of St. Louis, specifically the St. Louis Public Housing Authority to discuss current resources being dedicated to the homeless population. Through all consultation efforts it was apparent that the need for more permanent housing for the homeless population continues to be priority for the City of St. Louis, its service providers, and homeless population.

Furthermore, CDA and DHS have continued efforts to solicit feedback from the St. Louis community regarding how to best use HOME ARP funds.

Organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Community Development Administration	Government- St Louis City	Individual meetings	CDA supported the need for funding two permanent housing developments, totaling up to 24 units
Department of Human Services	Government- St Louis City	Meetings	DHS supported the need for funding two permanent supportive housing developments, totaling up to 24 units
St Louis City – Mayoral Staff	Government – St Louis City	Meetings	Supported the need for funds for PSH
St Louis City Continuum of Care	Continuum of Care	Online Survey	They were contacted to provide feedback for the qualified population
St Louis Public Housing Authority	PHA/Housing	Online Survey and Consultation Session	They were contacted to provide feedback for the qualified population

Summarize feedback received and results of upfront consultation with these entities:

Through all consultation efforts it was apparent that the need for more permanent housing for the homeless population continues to be priority for the City of St. Louis, its service providers, and homeless population. These consultation efforts further solidified the need to focus on permanent housing to homeless individuals and families as defined in 24 CFR 91.5 (1). This includes individuals or families who lack a fixed, regular, and adequate nighttime residence.

Public Participation

During the HOME ARP allocation plan public participation process, the following are dates of the public comment period and public hearing(s) held during the development of the plan:

- Date(s) of public notice: 6/14/2022
- Public comment period: start date - 6/15/2022 end date - 6/30/2022
- Date(s) of public hearing: 6/30/2022

Describe the public participation process:

The City of St. Louis made available a draft HOME-ARP Plan that identified federal funds made available and the range of activities that the City of St. Louis may undertake. It was made available for review on June 14, 2022 at the offices of the Community Development Administration at 1520 Market Street, Suite 2000, and on the City of St. Louis's website at <http://www.stlouis-mo.gov/cda>. In addition, a virtual public hearing has been scheduled for June 30, 2022 to allow for public comment and feedback regarding the HOME ARP plan.

Describe efforts to broaden public participation:

The notice regarding draft availability and public hearing was also posted in various locations and emailed to the CDBG mailing list on June 14, 2022. Advertisements indicating the availability of the draft report, the solicitation of public comments for the draft report, and notice of a public hearing to allow for any comments on the HOME ARP draft appeared in the *St. Louis American* on Thursday June 16, 2022. To allow for more access from the public, there will be a virtual public hearing for the City of St. Louis HOME ARP plan that can be accessed from a computer or personal cell phone to allow for convenience and ensure proper safety measures.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

Comments and Questions are open to be received through June 30, 2022. All comments and questions received through June 30 will be considered prior to submission of the final draft plan to HUD.

Summarize any comments or recommendations not accepted and state the reasons why:

Currently there are no comments or recommendation that have not been accepted.

Needs Assessment and Gaps Analysis

The Needs Assessment and Gaps Analysis examines the size and composition of qualifying populations, identifies current resources available, assesses unmet housing and services needs of these populations, and calls attention to existing gaps. Each year, Continuums of Care (CoCs) across the country are required by HUD to conduct a census of who is experiencing homelessness on the last Wednesday in January. In addition to counting anyone staying in an emergency shelter on that night, outreach is conducted to identify persons spending the night outdoors or in places not meant for human habitation. The Point-in-Time (PIT) count identifies the number of people who were homeless on one particular night. By itself, it is not a reliable predictor of how many people will be homeless or receive housing resources in a year. When used along with other data, it can provide key information on the state of homelessness currently, and over time. The 2021 Point in Time Census Count and Housing Inventory Chart were primary sources of data utilized to identify the needs assessment and gaps analysis.

Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	166	52	435	-	2								
Transitional Housing	140	62	184	-	101								
Permanent Supportive Housing	701	210	1120	-	273								
Rapid Rehousing	329	103	98	-	37								
Other Permanent Housing	0	0	69	0	10								
Sheltered Homeless						87	557	125	79				
Unsheltered Homeless						-	159	-	-				
Current Gap										87	-	920	#

Suggested Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	79,535		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	27,070		
Rental Units Affordable to HH at 50% AMI (Other Populations)	13,925		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		21,310	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		10,605	
Current Gaps			31,915

Data Sources: 1. Comprehensive Housing Affordability Strategy (CHAS)

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

Homeless:

The 2021 Point in Time (PIT) count discovered 997 people who were homeless in St. Louis. A total of 838 persons were counted as "sheltered homeless", with 546 residing in emergency shelters and 292 residing in transitional housing in. Of the people counted as homeless in 2021 PIT count that were sheltered, 547 identified as male, 287 as female, and 4 identified as transgender or gender non-conforming. 418 were persons over age of 24, and 143 of the people were identified as chronically homeless and with a majority listed as unsheltered. 125 Veterans were counted as homeless. The homeless sheltered population was predominantly Black/African-American with 620 individuals, followed by White with 173 individuals. Census.gov reports that the current racial makeup of the City is 45.7% Black/African-American and 46.4% White, however, homeless number of Black/African-Americans is almost quadruple that of the homeless number of Whites.

At Risk of Homelessness:

HUD defines those at risk of homelessness as individuals and families who have an income below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless, or live with instability (e.g., moving two or more times during the last 60 days due to economic reasons). According to HUD's 2014 – 2018 Comprehensive Housing Affordability Strategy (CHAS) data, of a total of 140,455 households:

*St. Louis has 33,585 households with incomes at or below 30% of AMI, which is 23.9% of all St. Louis households;

*In addition, of a total of 140,455 households, 79,535 of those households are renters of which 27,070, or 34% of renters, have incomes at or below 30% of AMI;

*Lastly, of those 27,070 renters living at or below 30%, 21,310 are considered cost burden in terms of their ratio of housing costs to household income and as a result, at risk of homelessness. This segment of renters is likely living on the financial edge and may be at risk for a housing crisis event or homelessness at any given point in time.

Populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability:

HUD defines those at greatest risk of housing instability as households that have an annual income less than 30% of AMI and are experiencing severe cost burden or have an income less than 50% of AMI and meet a certain condition, like living in someone else's home or living in a hotel due to an economic hardship. Those who are at risk of housing instability are often low-income, earning less than 30% or 50% of the area median income (AMI) and experience cost burden or severe cost burden. According to HUD's 2014 – 2018 Comprehensive Housing Affordability Strategy (CHAS) data, of a total of 140,455 households, St. Louis has 20,365 households with incomes between 30% and 50% of AMI, which is 14.5% of all St. Louis households. When analyzing the total population earning less than 50% of AMI, this accounts for 38.4% of all St. Louis households. These figures are being provided to further reinforce, that having a sufficient supply of affordable housing units is essential to ensuring housing stability throughout the City is part of keeping individuals housed.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:

The City of St. Louis owns an emergency shelter, Biddle House. There is a subcontractor that handles the day to day operations of the Biddle House emergency shelter. The City of St. Louis has also invested in tiny homes for the homeless though out specific areas of the city. It is important to note, however, that outside of these resources mentioned, the City of St. Louis does not currently own any other housing development or units dedicated to the homeless population.

Describe the unmet housing and service needs of qualifying populations:

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

The City of St. Louis counted 79 individuals were identified as victims of domestic violence. While this is a population was not the primary focus of HOME ARP funding due to the need for discretion when providing housing for these individuals as well as their being resources currently that allow for immediate assistance.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

The City of St. Louis plans to administer a NOFA or Notice of Funding Available directly to identify developers to facilitate the HOME ARP development projects. This NOFA will be issued after submission and approval of this initial plan. CDA administers these programs for the City in an effort to expand the supply of quality and affordable housing and to stabilize City neighborhoods through the remediation of blighted areas. In the event the City is not able to administer the activities as intended, a managing subrecipient may be selected in order to carry out those activities, which would involve applications being solicited for developers, service providers, subrecipients and/or contractors.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 0.00		
Acquisition and Development of Non-Congregate Shelters	\$ 0.00		
Tenant Based Rental Assistance (TBRA)	\$ 0.00		
Development of Affordable Rental Housing Units	\$ 9,040,194.55		
Non-Profit Operating	\$ 0.00	# %	5%
Non-Profit Capacity Building	\$ 0.00	# %	5%
Administration and Planning	\$ 1,595,328.45	15%	15%
Total HOME ARP Allocation	\$ 10,635,523		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

One of the major gaps in the City's homeless inventory is access to affordable housing. People experiencing housing crisis or fleeing an unsafe situation need to find a place to stay quickly. Access to this type of housing is a current gap in the system. Developing affordable housing across St. Louis, specifically housing to assist those who are homeless or at risk of homeless can help to fill this gap. The City of St. Louis will concentrate its efforts on this gap area.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations to be produced or supported with HOME-ARP funding:

The City of St. Louis HOME ARP affordable housing production plan will be used establish between 24-40 units for occupancy by qualifying populations. Development of these units will help address the ongoing need for additional permanent housing resources within the City of St. Louis. A minimum of 24 new individual units utilizing HOME-ARP funds will be established by the end of 2024. Development of these units will occur on land currently owned by the City of St. Louis. Through utilizing land current within CDA's landbank inventory, the City will ensure that site control is maintained throughout this development process in addition to proper environmental review of any and all future site locations.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

The City intends to construct a minimum of 24 newly constructed individual units to assist persons who are experiencing homelessness and those who are fleeing or attempting to flee domestic violence to locate, obtain, and maintain permanent housing. HOME-ARP funds may be used to acquire, rehabilitate, or construct affordable housing primarily for occupancy by households of individual and families that meet the definition of one or more of the qualifying populations. Priority will be given to projects that develop rental housing for person who are experiencing homelessness and those who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by HUD.

Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

Individuals and families that are experiencing or at-risk of homeless will be priority. In addition to housing instability, homeless individuals are more susceptible to acute health concerns, physical or sexual assault, and drug and alcohol abuse, making them some of the most vulnerable populations and in need of specialized and intense services. Housing or shelter assistance will support these families or individuals leaving homelessness. The City will also give priority to families or individuals who are fleeing, or attempting to flee, domestic violence, and sexual assault.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

The City will support activities that prioritize individuals and families who are the most vulnerable to improve the quality of life for program participants. These qualifying populations require assistance transitioning to housing, short-term or long-term supportive services like case management, legal services, or other supportive services. These families will have a higher likelihood of becoming self-sustaining over time with better housing options and wrap-around services.

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). :

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***
Not Applicable
- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***
Not Applicable
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***
Not Applicable
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***
Not Applicable
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***
Not Applicable
- ***Other requirements in the PJ's guidelines, if applicable:***
Not Applicable